

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**ROBERT COOREMANS**

**VS.**

**WORLDWIDE ASSET RECOVERIES, LLC**

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**NO: SA:13-CV-01052-OLG**

**JOINT PROPOSED SCHEDULING ORDER**

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After conferring pursuant to the Court's Order the parties jointly submit this Proposed Scheduling Order:

1. A report on alternative dispute resolution in compliance with Local Rule CV-88 shall be filed by August 15, 2014.
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by September 15, 2014 and each opposing party shall respond, in writing, by September 29, 2014.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by September 1, 2014.
4. All parties asserting claims for relief shall FILE their designation of testifying experts and SERVE on all parties, but not file, the material required by Fed. R. Civ. P. 26(a)(2)(B) by September 15, 2014. Parties resisting claims for relief shall FILE their designation of testifying experts and SERVE on all parties, but not file, the materials required by Fed. R. Civ. P. 26(a)(2)(B) by October 14, 2014. All designations of rebuttal experts shall be FILED, and the materials required by Fed. R. Civ. P. 26(a)(2)(B) for such rebuttal experts, to the extent not already served, shall be SERVED, within 15 days of receipt of

the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within (11) days of receipt of the written report of the experts proposed testimony, or within (11) days of the expert's deposition, if a deposition is taken, whichever is later.

The parties shall complete all discovery on or before November 13, 2014. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

6. The parties shall mediate this case before November 14, 2014, unless the parties seek an order from the Court excusing them from mediation.
7. All dispositive motions shall be filed no later than November 28, 2014. Dispositive motions as defined in Local Rule CV-7(h) and responses to dispositive motions shall be limited to 20 pages in length.
8. This case is set for jury selection on March 16, 2015 at 9:30 a.m. The parties should consult Local Rule CV-16(e) regarding matters to be filed in advance of trial.

9. All of the parties who have appeared in the action have conferred concerning the contents of the proposed scheduling order on June 16, 2014 and the parties have agreed to its contents.

Respectfully Submitted,

/s/ William M. Clanton  
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